

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 04-30004-MAP
	)	
ROOSEVELT ARCHIE,	)	
Defendant.	)	
	)	

THE GOVERNMENT'S MOTION FOR AN ORDER OF EXCLUDABLE DELAY AND  
REQUEST FOR A STATUS DATE  
(Assented to)

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, respectfully moves for an order of excludable delay under the Speedy Trial Act, 18 U.S.C. §3161. In support of this motion, the government states that Counsel for Defendant, Attorney Vincent Bongiorno, requests further time to meet with the Defendant to discuss the Defendant's likely change of plea. The undersigned Assistant U.S. Attorney and Attorney Bongiorno have engaged in plea negotiations, and are almost certain that there will be a plea agreement in this matter, and the Defendant's Motion to Suppress would be withdrawn. The Defendant has assented to this motion to exclude the time from March 28, 2005, until the date this Court sets for the next status date.

It is in the best interests of the Defendant, the government, and the public, to exclude the time from March 28, 2005 until the next status conference, from the period withing which the trial of this case must commence under the Speedy Trial

Act.

The parties respectfully request a status date - to be held on a date between April 18, 2005 and April 26, 2005, or May 3 and May 13, 2005 - at which time it is very likely the parties will request a date for change of plea.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ Paul Hart Smyth

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Paul Hart Smyth  
Assistant U.S. Attorney

Dated: April 15, 2005

CERTIFICATE OF SERVICE

Hampden, ss.

Springfield, Massachusetts  
April 15, 2005

I, Paul Hart Smyth, Assistant U.S. Attorney, do hereby  
certify that I have served a copy of the foregoing by mail to  
Attorney Vincent Bongiorno, 95 State Street, Springfield, MA.

S/ Paul Hart Smyth  
Paul Hart Smyth  
Assistant U.S. Attorney